



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

June 14, 2022

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re:     *United States v. Ronald Rogers, Anauncia Rogers, 22 Cr. 321 (JMF)***

Dear Judge Furman:

The Government writes in advance of the arraignment and initial conference in this matter that is scheduled for June 30, 2022, at 3 p.m. Although the 70-day trial clock under the Speedy Trial Act does not begin to run until arraignment, *see United States v. Nixon*, 779 F.2d 126 (2d Cir. 1985), the Government nevertheless requests the express exclusion of time in the interests of justice pursuant to 18 U.S.C. § 3161(h)(7) from today's date until June 30, 2022. The interests served by such an exclusion outweigh the public and the defendants' interest in a speedy trial because an exclusion will allow the Government to begin gathering and producing and will ensure the effective representation of counsel in light of difficulties in attorney-client communication occasioned by the COVID-19 pandemic. Counsel for the defendants consent to the requested exclusion.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:   
Matthew J. King  
Assistant United States Attorney

Cc: Ian Marcus Amelkin, Esq. (via ECF)  
Judy Fleming, Esq. (via email)